| UNITED STATES DISTRICT COU | JRT |
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| SOUTHERN DISTRICT OF NEW | YORK |

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AUTOMOBILE CLUB OF NEW YORK, INC. d/b/a AAA NEW YORK and AAA NORTH JERSEY, INC.,

Plaintiffs,

No. 11 Civ. 6746 (RKE) (HBP)

-against-

THE PORT AUTHORITY OF NEW YORK AND NEW JERSEY,

Defendant.

ORAL ARGUMENT REQUESTED

NOTICE OF PORT AUTHORITY CHAIRMAN DAVID SAMSON'S AND COMMISSIONER JEFFREY H. LYNFORD'S MOTION TO QUASH SUBPOENAS OR, IN THE ALTERNATIVE, FOR A PROTECTIVE ORDER

PLEASE TAKE NOTICE that, Port Authority Chairman David Samson and Commissioner

Jeffrey H. Lynford will serve their Memorandum of Law of in support of their Motion to Quash

Subpoenas or, in the Alternative, for a Protective Order, and the accompanying Declaration of

Alexander Southwell, dated October 10, 2012, upon Plaintiffs Automobile Club of New York, Inc.

and AAA New Jersey, Inc. (collectively, "AAA") on October 10, 2012. AAA will serve their

opposition to the motion on or before October 17, 2012. Chairman Samson and Commissioner

Lynford will serve their reply in further support of their motion three days after receipt of service of

AAA's opposition to their motion, at which point Chairman Samson and Commissioner Lynford will

move this Court, before the Honorable Robert Lee Pitman, United States District Judge, at a time and
date to be determined by the Court, at the United States Courthouse, 500 Pearl Street, New York, NY

10007, for an Order quashing subpoenas or, in the alternative, issuing a protective order, and granting
such other and further relief as the Court deems just and proper.

Dated: New York, New York

October 10, 2012

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Commissioner Jeffrey Lynford